

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: TRIBUNE COMPANY  
FRAUDULENT CONVEYANCE  
LITIGATION

Consolidated Multidistrict Action

Docket No. 11-MD-2296 (WHP)

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that Milbank, Tweed, Hadley & McCloy LLP (“Milbank”) hereby appears as counsel of record for the following defendants in the following matters, and requests that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives any defense or objection including, but not limited to, lack of jurisdiction and/or lack of or improper process and/or service of process.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against any entity either in this case or in any other action, are expressly reserved.

*Deutsche Bank Trust Co. Ams. v. Blackrock Institutional Trust Co., N.A.*, Case No. 11-cv-9319 (S.D.N.Y.): Credit Suisse Securities (Europe) Ltd.; Goldman Sachs Variable Insurance Trust; Fidelity Rutland Square Trust II; Fidelity Advisor Series I; Fidelity Select Portfolios; Variable Insurance Products Fund; Variable Insurance Products Fund III

*Deutsche Bank Trust Co. Ams. v. Adaly Opportunity Fund TD Secs., Inc.*, Case No. 11-cv-4784 (S.D.N.Y.): RBC O'Shaughnessy U.S. Value Fund; RBC Global Asset Management, Inc.; State Street Bank & Trust Company

*Deutsche Bank Trust Co. Ams. v. First Republic*, Case No. 1:11-cv-09572 (S.D.N.Y.): Lyxor/Canyon Value Realization Fund Limited

*Deutsche Bank Trust Co. Ams. v. Richard Paniagua, et al.*, Case No. 11-cv-10982 (D. Mass): State Street Bank & Trust Company

*Deutsche Bank Trust Co. Americas, et al. v. Ohlson Enters., et al.*, 1:12-cv-00064-WHP: State Street Bank & Trust Company

Dated: New York, New York  
December 18, 2012

Respectfully submitted,

/s/ Alan J. Stone

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